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REC'D TN August 13, 1999  
REGULATORY / Via Fax and Overnight

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OFFICE OF THE  
EXECUTIVE SECRETARY

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37219-0412  
(615) 741-3939

RE: TRA Docket 99-00183; Global NAPs Gulf, Inc.  
Application for Certificate to Provide Competing Local Telecommunications  
Services

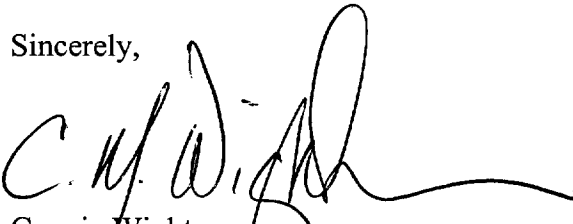
Dear Sir or Madame:

Enclosed for filing are the original and thirteen (13) copies of the revised Dialing  
Parity Plan of Global NAPs Gulf, Inc.

Please acknowledge receipt of this filing by returning, date-stamped, the extra copy  
of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

If any questions arise regarding this filing, please do not hesitate to call me at (407)  
740-8575. Thank you for your assistance.

Sincerely,



Connie Wightman  
Consultant to Global NAPs Gulf

cc: John Postl  
File GNGI - TN

TNL9900d

**GLOBAL NAPS GULF, INC.  
DIALING PARITY PLAN**

**I. OBJECTIVE/PURPOSE**

The intent of this Dialing Parity Plan is to permit Customers to route intraLATA toll calls automatically, without the use of access codes, to any interexchange carrier ("IXC") of the Customer's choice that has established itself as an access Customer under GNGI's Access Services Tariff that GNGI will file prior to launch of service in Tennessee.

**II. IMPLEMENTATION SCHEDULE**

GNGI proposes to begin providing local exchange service in various Tennessee markets currently served by BellSouth approximately in the fourth quarter of this year. The exchange areas covered in this Dialing Parity Plan include all of the exchanges in the four LATAs currently served by BellSouth. As it has done in states, GNGI will notify various IXC's regarding GNGI's plans when it is ready to launch local service in Tennessee. In addition, GNGI has developed an information package to send to each inquiring IXC, after notification, which explains how access service can be obtained.

**III. CARRIER SELECTION PROCEDURES**

GNGI will implement a full 2-PIC carrier selection methodology. With the full 2-PIC methodology, Customers will be able to presubscribe to the same or a different participating telecommunications carrier for intraLATA toll calls.

Processes have been established to provide new Customers with an opportunity to choose their intraLATA toll carrier. Company employees who communication with the public, accept orders and serve in customer service capacities are being trained to explain to Customers the availability of 2-PIC equal access, and to assist Customers in making an initial PIC choice or in changing a PIC choice for intraLATA and interLATA toll calls.

The Company has developed anti-slamming procedures consistent with FCC and state requirements that include signed letters of agency for carrier changes and/or third party verification of all PIC change requests.

#### **IV. NEW CUSTOMERS**

Customers who contact GNGI requesting new telephone exchange service will be informed of the opportunity to choose both an intraLATA and interLATA PIC. If requested by the Customer, GNGI will provide a list of telecommunications carriers, including GNGI, that are access Customers and are maintaining a relationship with GNGI pursuant to the provisions of the Company's Access Services Tariff. The list of intraLATA toll carriers will be presented in a competitively neutral manner to new Customers who do not make a positive choice for an intraLATA carrier. If the customer fails to choose a carrier, the customer will be required to dial an access code on a call by call basis to reach their carrier of choice.

#### **V. EXISTING CUSTOMERS**

As indicated above, GNGI is a new carrier in Tennessee and, thus, has no existing Customer base. GNGI proposes to provide intraLATA equal access as a feature of the Company's Tennessee local exchange service upon launch of that service. Therefore, no notification to existing Customers is required.

#### **VI. CARRIER NOTIFICATION**

Interexchange carriers that desire to become access Customers shall notify GNGI via letter or telephone call of their desire to obtain Exchange Access Service information or by completing an Access Service Request ("ASR") form. Many IXC's have already contacted GNGI for information. GNGI will send each requesting carrier an information package describing GNGI's service, processes and applicable tariffs. Once GNGI receives and processes an IXC's Access Service Request, that carrier will be added to the list of participating carriers made available to a requesting Customer trying to choose a PIC. GNGI will provide notice of those switches available for exchange access services to IXCs by identifying those switches in NECA Tariff FCC No. 4. In addition, GNGI will include a list of available switches in its information package provided to each IXC in response to an inquiry.

#### **VII. NONDISCRIMINATORY ACCESS**

GNGI will provide access for its customers to operator services, directory assistance and directory listings. GNGI will provide nondiscriminatory access to its listings database and inward operator services to those IXCs and LECs who also serve the same customers.

## **VIII. COMPLIANCE**

The Company will comply with all rules set forth by the FCC and the Tennessee Regulatory Authority. GNGI has not requested modification of Section 251(f)(2) of the Telecommunications Act of 1996.

## **IX. COST RECOVERY**

GNGI does not expect to experience additional incremental costs of implementation of intraLATA dialing parity and, therefore, will not add rate elements to recover costs. Subsequent consumer PIC changes after initial installation will be \$5.00 for facilities-based services or a pass-through of the ILEC charges for resold services.